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Attorneys for Defendants
 ONIKA TANYA MIRAJ AND HARAJUKU BARBIE MUSIC, LLC

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

JULIUS JOHNSON, an individual,
 Plaintiff,

vs.

ONIKA TANYA MARAJ P/K/A NICK
 MINAJ, in individual; UNIVERSAL MUSIC
 GROUP, INC., a Delaware corporation;
 SONGS OF UNIVERSAL, INC., a
 California corporation; MICHAEL LEN
 WILLIAMS II, P/K/A MIKE WILL MADE
 IT, an individual; KAZARION FOWLER
 PKA SKOOLY, an individual; MONEY
 MACK MUSIC, INC., a Louisiana
 corporation; HARAJUKU BARBIE MUSIC,
 LLC, a Delaware limited liability company;
 ESTHER RENAY DEAN P/K/A ESTHER
 DEAN, an individual; MARCUS BELL, an
 individual; SOUNDS FROM
 EARDRUMMERS LLC, a Georgia
 Corporation; WB MUSIC CORP., a
 Delaware Corporation; DAT DAMN DEAN;
 and DOES 1-10, inclusive.

Defendants.

CASE NO. 2:23-cv-05061-PA-
 AFM
**ONIKA TANYA MIRAJ AND
 HARAJUKU BARBIE
 MUSIC, LLC'S NOTICE OF
 JOINDER TO MOTION TO
 DISMISS FILED BY
 DEFENDANTS
 MICHAEL LEN WILLIAMS,
 II; SOUNDS FROM
 EARDRUMMERS, LLC; W
 CHAPPELL MUSIC CORP
 F/K/A WB MUSIC CORP.**

Honorable Percy Anderson

Date: December 11, 2023
 Time: 1:30 p.m.
 Place: Courtroom 9A

1 TO THE COURT, THE PARTIES, AND TO THEIR ATTORNEYS OF
2 RECORD:

3 PLEASE TAKE NOTICE THAT Defendants Onika Tanya Miraj and
4 Harajuku Barbie Music, LLC (“Joining Defendants”) hereby move to join in
5 Defendants Michael Len Williams, II; Sounds From Eardrummers, LLC; W
6 Chappell Music Corp f/k/a WB Music Corp. (“Moving Defendants”)’s Motion to
7 Dismiss Plaintiff’s First Amended Complaint filed in the above-entitled action on
8 November 13, 2023 (ECF No. 54.)

9 Joining Defendants move to join in each argument asserted by Moving
10 Defendants in their motion to dismiss, all of which apply equally to Joining
11 Defendants: (1) The complaint is an impermissible “shotgun pleading” in violation
12 of Fed. R. Civ. P. 8; (2) The complaint improperly alleges direct, vicarious, and
13 contributory copyright infringement against all Defendants; (3) The complaint fails
14 to plausibly allege direct infringement due to (a) failure to allege copying; (b)
15 failure to comply with 17 U.S.C. § 411 for the alleged musical composition; (c)
16 failure to allege access; and (d) failure to allege striking similarity; (4); The
17 complaint fails to allege conversion; and (5) The complaint fails to allege unfair
18 competition

19 For the reasons identified by Moving Defendants in the motion to dismiss,
20 the Complaint should be dismissed in its entirety with prejudice as to Joining
21 Defendants.

22 Dated: November 13, 2023

GORDON REES SCULLY
MANSUKHANI, LLP

23
24 By: /s/ Susan B. Meyer

25 Mark S. Posard

26 Susan B. Meyer

27 Attorneys for Defendants

Onika Tanya Miraj and Harajuku

Barbie Music, LLC